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February 22, 2024

Hon. Kenneth M. Karas
United States District Court
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *Tay v. The New York and Presbyterian Hospital*,
Case No. 7:22-cv-08379-KMK

Dear Judge Karas:

We represent the Defendant, The New York and Presbyterian Hospital (“Hospital”) in the above-identified matter. We write to respectfully request that the Court modify the briefing schedule set forth in the December 1, 2023 Order (DE 69) on Plaintiff’s Motion for Conditional Collective Certification.

Plaintiff filed her Motion for Conditional Collective Certification on February 1, 2024. (DE 78). Currently, the Hospital’s opposition is due on March 1, 2024, and Plaintiff’s reply is due on March 15, 2024. The Hospital requests that the Court extend the briefing schedule by two weeks, as follows:

- Deadline for the Hospital to file Opposition: from March 1 to March 15, 2024; and
- Deadline for Plaintiff to file Reply: from March 15 to April 1, 2024 (due to the holiday falling on Friday, March 29, 2024).

Several reasons support this request, including that the primary client contact at the Hospital has been out of the office during the week of February 19, 2024, and the undersigned counsel for the Hospital and primary drafter of the Hospital’s opposition has been actively engaged in three depositions and several court conferences during the last two weeks. The additional time sought will enable the Hospital to fully review the arguments presented in Plaintiff’s lengthy motion papers and prepare its response. Respectfully, the Hospital submits that enlarging the briefing schedule as requested

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herein will ensure that the briefing presented to the Court fully addresses the legal and factual issues relevant to the Court's adjudication of the motion.

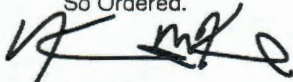
Prior to submitting this request, counsel for the Hospital conferred with counsel for Plaintiff to request Plaintiff's consent to the proposed extension of the briefing schedule. Plaintiff consents to a one-week extension of the Hospital's time to file its opposition to Plaintiff's motion (*i.e.*, from March 1 to March 8, 2024) with a concomitant one-week extension of Plaintiff's time to reply (*i.e.*, from March 15 to March 22, 2024), but did not agree to the requested two-week extension of the briefing schedule.

This is the Hospital's first request to modify the briefing schedule on Plaintiff's Motion for Conditional Collective Certification, and the requested extension will not affect any other currently scheduled deadlines.

Thank you for Your Honor's time and consideration.

Granted.

So Ordered.


2/22/24

Sincerely,

/s/ Adriana S. Kosovych

Adriana S. Kosovych

cc: C.K. Lee, Esq. (via ECF)
James Jackson, Esq. (via ECF)